



MICHIGAN PUBLIC SAFETY FREQUENCY ADVISORY COMMITTEE (MPSFAC)

Serving Michigan RF Spectrum Users in the 39, 155, 460, 700 and 800 Mhz. bands Since 1946

CHAIRPERSON

Ken Bradshaw
21930 Dunham
Mt. Clemens, MI 48043
(586)469-6433
kbradshaw@mscombsystems.net

VICE CHAIRPERSON:

Dale Berry
Huron Valley Ambulance
1200 State Circle
Ann Arbor, MI 48108
(734)477-8262
dberry@hva.org

SECRETARY/TREASURER:

Patricia Coates
Oakland County CLIMIS
1200 N. Telegraph Bldg 48W
Pontiac, MI 48341
(248)452-9947
coatesp@ocakgov.com

DIRECT CORRESPONDENCE TO:

Kathy Bradshaw
APCO Local Frequency Advisor
21830 Dunham
Mount Clemens, MI 48043
(586)469-6433
kbradshaw@apco011.org

1 August 2013

Mr. David Turetsky, Bureau Chief
Public Safety and Homeland Security Bureau
445 12th Street SW
Washington D.C., 20554

RE: WT Docket 02-55 and General Docket 90-221

Dear Sir,

The Michigan Public Safety Frequency Advisory Committee (the Region 21 Regional Plan Update Committee) respectfully requests commission approval of this submission as an administrative correction to our recently approved revised Region 21 NPSPAC plan. As you know, our plan contains new agreements setting forth both dispute resolution and coordination procedures with our adjacent regions. It was found that while the revised plan informs applicants of the existence of inter-regional dispute resolution procedures it makes no mention of the inter-regional coordination requirements, even though these topics are covered under the same agreements. Therefore, we wish to correct this oversight by adding language to our bulleted list of "required submittals". We believe this addition will facilitate the application review process and avoid confusion and misunderstanding.

The revised Region 21 NPSPAC plan (approved by the commission on July 3, 2013) contains signed agreements with each of the adjoining regions (33, 45, 54, and 14) covering dispute resolution and coordination. Specific language requiring certain applicants seek adjacent region coordination is reproduced here; *"After intra-regional review, a copy of those frequency-specific applications requiring adjacent Region approval, including a definition statement of proposed service area, shall then be forwarded to the adjacent Region(s) for review."*¹ The agreements further state the precise conditions by which applications require adjacent region approval, *"If an applicant's proposed service area or interference contour extends into an adjacent Public Safety Region(s), the application must be approved by the affected Region(s)."*²

The plan also requires applicants furnish certain information to the regional planning committee to facilitate the application review process. The required information is listed in the section of the Region 21 plan titled "Required Application Submittals" found on page 9. We do not wish to leave it to chance that a potential applicant will glean this information from the appendices. So,

¹Region 21800 MHz Public Safety Band Regional Plan, Appendix A, Inter-Regional Coordination Procedures and Procedures for Resolution of Disputes That May Arise Under FCC Approved Plans, Section II, Paragraph (2)(e)

² Ibid., footnote to 1

MEMBER ORGANIZATIONS

APCO Local Frequency Advisor • Michigan Association of Ambulance Services • Michigan Association of Chiefs of Police
Michigan Association of Counties • Michigan Association of Fire Chiefs • Michigan Association of Public Communications Officials (four)
Michigan Department of Community Health • Michigan Department of Natural Resources • Michigan Department of Transportation
Michigan Municipal League • Michigan Public Safety Communications System • Michigan Sheriff's Association • Michigan State Police



MICHIGAN PUBLIC SAFETY FREQUENCY ADVISORY COMMITTEE (MPSFAC)

Serving Michigan RF Spectrum Users in the 39, 155, 460, 700 and 800 Mhz. bands Since 1946

CHAIRPERSON:
Keith Bradshaw
71450 Dunham
Mt. Clemens, MI 48043
(586)469-6433
Keith.Bradshaw@macombgov.org

VICE-CHAIRPERSON:
Dale Berry
Huron Valley Ambulance
1200 State Circle
Ann Arbor, MI 48106
(734)477-6262
dberry@hva.org

SECRETARY/TREASURER:
Patricia Costas
Oakland County CLINIS
1200 N. Telegraph Bldg 4W
Pontiac, MI 48341
(248)452-9947
pcostas@oakgov.com

DIRECT CORRESPONDENCE TO:
Keith Bradshaw
APCO Local Frequency Advisor
21800 Dunham
Mount Clemens, MI 48043
(586)469-6433
bradshawk@apco911.org

we would like to add an additional bullet point to this list requiring applicants provide, "Evidence of coordination with adjacent region(s) in the event an applicant's service area or co-channel interference contour extends into the adjoining region(s)." To maintain consistency, an amplifying paragraph is added to the submittals section with specific language copied directly from the agreements. Samples of both are attached.

As the criteria for adjacent region coordination and the requirement of informational submittals already appear in the approved plan, the proposed changes merely present what is already embodied within the plan document. Therefore, we request commission approval of these changes as an administrative correction to our regional plan.

Thank you for your continued support of the regional planning committees and the regional planning process. If you have any questions or require further information, please do not hesitate to contact me at 586-469-6433.

Respectfully,

Keith M. Bradshaw, Chairman
Michigan Public Safety Frequency Advisory Committee
keith.bradshaw@macombgov.org

cc Brad Stoddard, Michigan SWIC

MEMBER ORGANIZATIONS

APCO Local Frequency Advisor • Michigan Association of Ambulance Services • Michigan Association of Chiefs of Police
Michigan Association of Counties • Michigan Association of Fire Chiefs • Michigan Association of Public Communications Officials (four)
Michigan Department of Community Health • Michigan Department of Natural Resources • Michigan Department of Transportation
Michigan Municipal League • Michigan Public Safety Communications System • Michigan Sheriff's Association • Michigan State Police

applications so filed will be reviewed at the next scheduled meeting. The flow chart, entitled "Application Submission and Approval Flow Chart", depicts the sequence of steps the committee will use in the allocation of 800 MHz spectrum resources.

REQUIRED APPLICATION SUBMITTALS

Each applicant shall supply the following information:

- Statement of need for installing a new NPSPAC system.
- Explanation of budget commitment that has been made for the proposed system; include agency budgets and/or agency resolution(s).
- FCC Form(s) 601
- Details of engineering studies showing radio coverage will *not* exceed applicant's minimum requirements.
- An explanation of how an applicant's agency will comply with interoperability requirements of this plan.
- Proof of notification of surrounding entities of intent to seek 800 MHz channel resources and any plans or discussions to address cross-band and/or cross-agency interoperability
- An explanation of provision for future growth of agencies not involved in the initial system build out, if any.
- List of PW radio pool frequencies of all agencies migrating to new system. Provide a brief description of utilization along with dates they are to be given back to the PW pool.
- Evidence of coordination with adjacent region(s) in the event an applicant's service area or co-channel interference contour extends into the adjoining region(s). See Appendix A.

Statement of Need

Applicants are required to demonstrate need for frequencies requested. Frequency assignments will not be made so that applicants can storehouse such assignments for future use.

Budgetary Commitment

Applicants must demonstrate the financial resources to build the proposed system. Documentation in the form of Resolutions for bonding or other fiscal mechanisms or agency budgets must be provided.

provide the committee a schedule for those agencies to return their operating frequencies to the appropriate pool. While it is recognized by the Committee that circumstances may render impossible the return of all listed frequencies, it is expected that applicants shall make a good faith effort to return the maximum number of such as possible.

It is not consistent with the objectives of this Plan to allow agencies to “farm down” frequencies to other radio services within their political structure simply to take advantage of surplus equipment. The need for communications by such an agency may be outweighed by the needs of another political subdivision. “Warehousing” frequencies is not permitted under FCC rules. FCC-authorized frequency coordinators will be responsible for assignment of returned channels through normal coordination procedures.

Inter-Regional Coordination

If an applicant’s proposed service area or interference contour extends into an adjacent Public Safety Region(s), the application must be approved by the affected Region(s). Service area shall normally be defined as the area included within the geographical boundary of the applicant, plus three (3) miles. Interference contour shall normally be defined as a 5 dBu co-channel contour or a 25 dBu adjacent channel contour. See Appendix A.

Who to contact with questions.

Any questions regarding the application process may be directed to the Michigan APCO Local Advisor or the Chairperson of the MPSFAC. Contact information for persons currently holding these positions is available in the Appendix or on the MPSFAC and Michigan APCO website at www.MPSFAC.org and www.miapco.org respectively.

FREQUENCY ASSIGNMENT CRITERIA

International Treaty Considerations

Use of certain allotted frequencies in the counties east of the 85th meridian (Line A) is subject to international treaty obligations. These frequencies are noted in the channel allotments found in the appendix. Please see Title 47 Code of Federal Regulations Part 90.7 for the complete definition of Line A.